

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

United States of America  
*ex rel.* ALEX DOE, Relator,

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The State of Texas  
*ex rel.* ALEX DOE, Relator,

CIVIL ACTION NO. 2:21-CV-00022-Z

The State of Louisiana  
*ex rel.* ALEX DOE, Relator,

Date: March 25, 2022

Plaintiffs,

V.

Planned Parenthood Federation of America, Inc.,  
Planned Parenthood Gulf Coast, Inc., Planned  
Parenthood of Greater Texas, Inc., Planned  
Parenthood South Texas, Inc., Planned Parenthood  
Cameron County, Inc., Planned Parenthood San  
Antonio, Inc.,

## Defendants.

**DEFENDANTS' REPLY IN SUPPORT OF OPPOSITION TO REQUEST FOR CLERK'S  
ENTRY OF DEFAULT AND MOTION FOR EXTENSION OF TIME**

Relator and the State of Texas have essentially conceded that a default should not enter here and have agreed to extend the time for Defendants to answer their complaints to May 20, 2022. Relator and Texas have also conceded that the deadline for Defendants to move for reconsideration or certification of interlocutory appeal has not yet expired. Because Defendants will be moving for reconsideration or certification of an order denying motions to dismiss, Defendants respectfully submit that it would be more efficient to permit them to defer filing answers that may ultimately be deemed without legal effect until the Court decides whether to reconsider or certify. Nonetheless, Defendants will be prepared to answer the complaints on May 20, 2022, if the Court so orders, without prejudice to their ability to file a motion for reconsideration or certification shortly thereafter. As noted above, in the event the Court grants Defendants' motion for reconsideration or certification, the answers filed on May 20 will be without legal effect.

For these reasons, Defendants respectfully request that the Court permit Defendants to defer filing answers until it rules on their forthcoming motion for reconsideration or certification and further order that Defendants file their answers within five days of such a ruling. In the alternative, the Court should order the relief now sought by Relator and Texas – that the Court permit Defendants to answer the complaints by May 20, 2022, without prejudice to their ability to file a motion for reconsideration or certification.

Dated: May 18, 2022

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER  
LLP

By /s/ Craig D. Margolis

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 18, 2022, the foregoing document was electronically filed with the Clerk of Court using CM/ECF.

*/s/ Craig D. Margolis*

Craig D. Margolis